



4 June 2010

Federal Communications Commission  
Washington, D.C. 20554

**RE: Structure and Practices of the Video Relay Service Program**  
**CG Docket No. 10-51**  
**DECLARATORY RULING, ORDER AND NOTICE OF PROPOSED RULEMAKING**  
**Adopted: May 24, 2010 Released: May 27, 2010**

1. These comments are submitted on behalf of the Canadian Association of the Deaf (CAD) with the support of Sign Relay Canada - Service de Relais Canada (SRC). While they come from entities outside the United States, we believe our comments may be of value in the Commission's assessment of Video Relay Services provided in the U.S.
2. The CAD is the national advocacy association of Deaf people in Canada, similar to the National Association of the Deaf (NAD) in the United States. The SRC is a corporation jointly established by the CAD and the Canadian Cultural Society of the Deaf for the purpose of advocating specifically for VRS in Canada.
3. At the present time, despite more than eight years of vigorous work by the CAD, the SRC, and other Deaf organizations and individuals, Canada is still without any indigenous VRS at all. The two major telecom companies, Bell Canada and Telus, are both required by the Canadian Radio-television and Telecommunications Commission (CRTC) to conduct limited tests of regional VRS's by the end of December 2011, and then report back to the CRTC which will then consider future action to be undertaken. Accordingly, it is unlikely that any full-service, permanent VRS will be established anywhere in Canada before 2013.
4. Deaf Canadians have watched enviously as Deaf Americans have enjoyed VRS for many years. Some of us have been able to experience one or more of the services. With respect to paragraphs 27-29 of the Declaratory Ruling, we note that while the Commission recently cracked-down on ineligible calls originating in Canada, there is little consistency or clarity in the implementation of the relevant rules; for example, some providers still accept calls originating in Canada as long as the callee is located in the U.S., other providers do not. Thus, the Commission needs to set and enforce a more comprehensive policy regarding the eligibility of VRS calls that originate outside the U.S.

The Canadian Association of the Deaf  
L'Association des Sourds du Canada

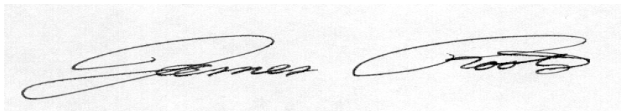
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5. The chief concern we wish to raise in these comments is with regards to paragraphs 17-18 of the Declaratory Ruling, to wit: call centres located outside the U.S. As the Commission has noted, several such centres have already been established throughout Canada. These have had a profound and negative impact upon the Deaf community in every section of our country.
6. As has happened wherever call centres have been built in the U.S., there has been an immediate siphoning of the available pool of interpreters in the affected community as these skilled professionals are attracted to the salaries, security, and other benefits offered by VRS providers. Hundreds of requests for community interpreting services must be turned down each year as a consequence of this drain upon the supply of interpreters. We know of dozens of cases in which Deaf Canadians have been forced to leave school and post-secondary institutions, have lost jobs or job interviews, have been denied important medical services including mental health or substance abuse treatments, and have missed out on meetings relating to vital social supports, because interpreters are no longer available once VRS call centres have been established in their region.
7. The unique point of our concern is that our interpreters were taken from the Deaf Canadian community by VRS providers without the Deaf Canadian community being provided any of the benefits of the VRS itself. We are not allowed to access those VRS's. At least those Deaf Americans who are made to suffer the same kind of reduction in community interpreting services are permitted the trade-off benefit of accessing VRS interpreting.
8. While the Commission may feel little concern for the situation of Deaf people in Canada, it should take into consideration the humanitarian fact that American VRS should do no harm to Deaf people outside the U.S. As it stands now, American VRS is a predator that is doing profound damage to the lives of Deaf Canadians without any offsetting benefits to us.
9. For the above reasons, the CAD and SRC recommend that either American providers of VRS be required to locate all of their call centres in the U.S., or that the Commission permit the extension of reimbursable VRS calls to include calls originating and terminating in Canada that are made through the providers that have established call centres in this country.

Sincerely,

A handwritten signature in black ink, appearing to read "James Roots", is written on a light-colored, textured background.

James Roots, Executive Director  
Canadian Association of the Deaf.